

Sustainability Appraisal

Introduction

1. These representations have been prepared on behalf of Gleeson Land in respect of its land interests at Land at Scant Road West, Hambrook ("the Site"). The Site is c. 3.0 ha. and is lies adjacent to the north eastern edge of Hambrook and the A27. The Site is ID reference HCH0024 within the Chichester Housing and Economic Land Availability Assessment, 2021 (HELAA).
2. The HELAA outlines that the Site has indicative capacity to deliver 80 dwellings. However, we envisage the capacity to be c. 56 dwellings. In accordance with the guidance and definitions within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guidance (PPG), the overall HELAA conclusions are that the Site is: suitable, available, achievable and deliverable for residential-led development within the period covered by the draft Chichester Local Plan ("the draft CLP").
3. The Site is in single ownership and controlled by Gleeson Land. Gleeson Land has a strong track record in providing deliverable planning consents to the housebuilding industry, which regularly results in new housing being built out in a timely manner. Our average time from receiving outline planning consent to commencement of development is 22 months. The average time from commencement to first occupation is 10 months. Subject to being allocated within either the Chichester Local Plan, or the emerging review of the Chidham and Hambrook Neighbourhood Plan, Gleeson Land expects completions on the Site to be achieved within five years from adoption of the plan.

Sustainability Appraisal

1. By way of context to these representations, we note that the Chichester Transport Study, dated January 2023, concludes at paragraphs 5.6.5 and 11.2.3:

"5.6.5 It is concluded that in the main, the 700 dpa (southern plan area) demands can generally be accommodated by the mitigation proposed for the 535 dpa core test although at the Portfield roundabout and Oving junction, capacity issues get worse with the 700 dpa demands, with additional mitigation being required. As no schemes have been designed to date, it would be advisable to retain some costs against for future works against Portfield Roundabout as a minimum."

"11.2.3 A sensitivity test with 700 dpa has been undertaken. It is concluded that in the main, the 700 dpa demands can generally be accommodated by the mitigation proposed for the 535 dpa core test, although at the Portfield roundabout and Oving junction, capacity issues get worse with the 700 dpa demands and these junctions may need to consider further mitigation. As no schemes have been designed to date, it would be advisable to retain some cost against for future works against Portfield Roundabout as a minimum. It is unlikely there would be significant capacity in the network beyond 700 dpa, considering full mitigation package."

2. Although the Transport Study is dated January 2023, it is noted that the report's Document Control Sheet (page ii) confirms it was first issued back in April 2022, and has since been the subject of revisions prior to finalisation.
3. The Transport Study conclusion that 535 dwellings per annum (dpa) was not an absolute 'cap' to housing development within the southern planning area was therefore well known to the Council during the time that the SA was being prepared to inform draft CLP decision-making process.
4. In view of the above, we are fundamentally concerned that the basis of the reasonable alternatives tested have been infected by a fundamentally flawed starting point conclusion that there is capacity for no more than 535 dpa within the southern planning area:

"The southern plan area (i.e. the east west corridor and Manhood Peninsula) is highly constrained by capacity on the A27. Detailed discussions with National Highways and WSCC, over the course of 2019-2022, have led to a resolution that there is capacity for no more than 535 dpa in this area" (paragraph 5.2.11, first bullet).

5. The SA must be revisited given that this factual flaw goes to the heart of the process of selecting and testing reasonable alternative options. Consequentially, the draft CLP decision-making making process will also need to be revisited, as this too has been infected by the factually incorrect SA.